IN THE UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF MISSISSIPPI GREENVILLE DIVISION

IKE CARTER PLAINTIFF

VERSUS CIVIL ACTION NO.: 4:24-CV-007-MPM-JMV

ILLINOIS CENTRAL RAILROAD COMPANY

**DEFENDANT** 

UNOPPOSED MOTION FOR JEREMY L. BIRDSALL TO WITHDRAW AS COUNSEL OF RECORD FOR DEFENDANT

**COMES NOW** defendant Illinois Central Railroad Company ("Illinois Central"), by and through its undersigned counsel, and for its Unopposed Motion for Jeremy L. Birdsall to withdraw as counsel of record for Defendant, states as follows:

- 1. The undersigned counsel for Illinois Central is leaving private practice to work within the Mississippi Bar's Office of General Counsel. His last day with his current firm, Fletcher & Sippel, LLC, is Friday, March 22, 2024. This employment change necessitates the filing of the instant motion.
- 2. Illinois Central will continue to be represented in this matter by three (3) other experienced and capable Mississippi attorneys with Fletcher & Sippel, LLC, all of whom have entered appearances herein.
- 3. Pursuant to L.U. Civ. R. 83.1(b)(3), the undersigned has notified the client, Illinois Central, of this withdrawal.
- 4. The undersigned has also contacted counsel for Plaintiff about the matter and has been authorized to represent that the instant motion is unopposed.

5. Illinois Central respectfully requests that it be excused from filing a memorandum brief pursuant to L.U. CIV. R. 7(b)(4), because the motion is unopposed and the reasons supporting the requested relief are detailed herein.

WHEREFORE Defendant respectfully moves the Court for an Order authorizing the withdrawal of Jeremy L. Birdsall as counsel of record for Illinois Central Railroad Company in this matter.

This, the 20th day of March 2024.

Respectfully submitted,

## ILLINOIS CENTRAL RAILROAD COMPANY

By:

/s/ Jeremy L. Birdsall

Jeremy L. Birdsall

## **OF COUNSEL:**

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## **CERTIFICATE OF SERVICE**

I, Jeremy L. Birdsall, attorney for Defendant, Illinois Central Railroad Company, hereby certify that I have filed the above **Unopposed Motion for Jeremy L. Birdsall to Withdraw as Counsel of Record for Defendant** with the Clerk of this Court via the ECF System, which served copies upon all counsel and parties of record.

This, the 20<sup>th</sup> day of March 2024.

/s/ Jeremy L. Birdsall